



A·P·MØLLER-MÆRSK

A.P. Moller - Maersk Group Anti-Corruption Policy

Corruption, including bribery, is against the law and against the A.P. Moller – Maersk Group values. We will work against corrupt practices by constantly focusing on anti-corruption measures that we can take as a Group.

Our Group core values are the foundation on which our company conducts business. They guide the way we carry out our jobs. Applying these values in every aspect of our work allows us to be proud of our work, including our ability to maintain high ethical standards in situations that can challenge those standards.

Maintaining our strong global reputation requires that we continually strive to meet the highest standards. Earning and maintaining our customers' trust require that every customer can sleep easily, knowing that we have gained its business solely through the quality of our work. Our core value of Uprightness means that good business is clean business, and that bribery cannot be part of our business.

Bribery is illegal worldwide and the Group is committed to strict compliance worldwide with relevant laws prohibiting bribery. We apply relevant international rules and standards dealing with facilitation payments and are committed to the eventual elimination of such payments.

No Group employee at any level may offer, promise, authorize or give anything of value to any public official in any country, or to any business partner, in order to gain any improper business advantage of any kind. Nor may any employee solicit or accept any form of bribe from any person.

We will implement and enforce this policy rigorously. Our company operates globally, including in some countries in which bribery and other corruption present difficult challenges. Implementing our policy will not only require that we steadfastly refuse requests and demands for bribes. We must also constantly be innovative in performing our work, so that we comply fully with our policies and anti-corruption laws, while remaining a competitive and profitable business. This is everyone's responsibility. Employees at any level who fail to comply with this policy, the Group Anti-corruption Guidelines and/or relevant laws will face internal discipline – and possible prosecution.

Corruption is a problem that companies face globally, and countering it effectively requires not only that we cooperate within our Group, but also that we increasingly cooperate, with governments, non-governmental organizations, business partners and business organizations, and others working against corruption globally.

Nils Smedegaard Andersen